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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2021 JUL -1 AM 11:08

Sanja Griffin - Robinson

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

COMPLAINT

New York City Health and Hospitals
Mitchell Katz president and
CEO

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

There was a breach in the protection under my medical information being disclosed to a person not involved in treatment. This information was disclosed by Social worker Lise Wilson without authorization that has resulted in harassment.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, SONJA-GRIFFIN-ROBINSON, is a citizen of the State of
(Plaintiff's name)

NEW YORK CITY

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

Citizenship of the parties

State of each party

Amount in controversy

Is the case a federal question case?

Is the case a diversity case?

If the defendant is an individual:

The defendant, Mitchell Katz, President
New York City Health Hospitals is a citizen of the State of
 (Defendant's name)

United States

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

N/A

If the defendant is a corporation:

The defendant, NYC Health & Hospitals is incorporated under the laws of the State of United States of America

and has its principal place of business in the State of United States

or is incorporated under the laws of (foreign state) N/A

and has its principal place of business in United States

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Sonja R. Griffin-Robinson
 First Name Middle Initial Last Name

P.O. BOX 928
 Street Address

New York N.Y. 10029
 County, City State Zip Code

917-669-4039 RobinsonSonja952@gmail.com
 Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	LISE WILSON		
	First Name	Last Name	
	SOCIAL WORKER		
	Current Job Title (or other identifying information)		
	HARLEM HOSP. CENTER 506 Lennox Ave 10037		
	Current Work Address (or other address where defendant may be served)		
	NEW YORK	N.Y.	Harlem Hosp. 10037
	County, City	State	Zip Code
Defendant 2:	RONALD COBB (MD)		
	First Name	Last Name	
	(MD)		
	Current Job Title (or other identifying information)		
	HARLEM HOSP. CENTER 506 Lennox Ave 10037 N.Y.		
	Current Work Address (or other address where defendant may be served)		
	New York	N.Y.	10037
	County, City	State	Zip Code
Defendant 3:	CHRISTOPHER PENA (MD)		
	First Name	Last Name	
	(MD)		
	Current Job Title (or other identifying information)		
	HARLEM HOSP. CENTER 506 Lennox Ave New York 10037		
	Current Work Address (or other address where defendant may be served)		
	NEW YORK	N.Y.	!))#&
	County, City	State	Zip Code

Defendant 4:

Mitchell

Katz

First Name

Last Name

President and CEO

Current Job Title (or other identifying information)

unavailable 125 Worth St.

Current Work Address (or other address where defendant may be served)

N.Y.

N.Y.

10013

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

SEE ATTACHED

Date(s) of occurrence:

on or about 1-14-20 to present 5/21

FACTS:

Proof and other documents available upon request

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

*Please see attached Statement of Claims
pgs. 1 through 8*

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

5-17-21
 Dated SONJA GRIFFIN-ROBINSON
 Plaintiff's Signature Sonja Griffin-Robinson

First Name	Middle Initial	Last Name
Street Address		
P.O. BOX 928 New York N.Y. 10029		
County, City	State	Zip Code
917-669-4039		Robinson Sonja 952@gmail.com
Telephone Number		Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

STATEMENT OF CLAIM

Place of Claim is Harlem Hospital

The date(s) of claim is as follows:

On or about the date of 1/14/20 at 1518 hrs. Defendant Lise Wilson told plaintiff she spoke to ADA Adrian Murphy about plaintiffs medical condition and the seriousness of a non-existent criminal charge that defendant Wilson has ran with, ie; spewing this information all over Harlem hospital to other employees and employers to the point that it has affected how plaintiff is being treated medically, this information is based on falsehood, the information that LISE WILSON has spread is false on all accounts. ADA ADRIAN MURPHY has told LISE WILSON that the plaintiff is charged with CRIMINAL POSSESSION OF A FIREARM.

These allegations are based on the fact that ADRIAN MURPHY has been trying to override doctors orders for the petitioner not to travel up to Westchester County to Court.

Since ADRIAN MURPHY cannot be prosecuted for any crimes while in office, she has used LISE WILSON to harass the petitioner and as a result of these false/slandorous allegations, it has gotten so bad that the petitioner is not being treated and it has also resulted in a Coupe to try and get the petitioner removed from the hospital for treatment, this is a hospital that the

the petitioner has been coming to for treatment since she was a child, and since Ms. Wilson has spoken to this ADA whom is out of line, sought out a weak link in the chain that does not know any better but should, having such a sensitive position at Harlem Hosp. Medical center

Under NYC Health & Hospitals, "The NOTICE OF PRIVACY PRACTICES, EXPRESSES IN PERTINENT PART UNDER:

USES AND DISCLOSURES OF HEALTH INFORMATION WHERE AUTHORIZATION IS REQUIRED:

NYC Health and Hospitals (MUST) obtain your written authorization before it can use or disclose your health info. in the following situations:

MARKETING. The system (MUST) obtain your written authorization before it can use your health information to communicate with you about purchasing or using a product of service, unless the communication is made face to face between you and the system and surely if the Court wanted this info. It would have summoned it (via) deuces tecum, that was not done here, this was done as a form of harassment by Westchester County District Attorney Adrian Murphy going through LISE WILSON thinking she was doing the right thing by violating the petitioner's (HIPPA LAW) that protects a patient's medical bill of rights, see NYC Health and hospital manual under LEGAL PROCEEDINGS page 3 paragraph (11) which states: if you are involved in a legal dispute,,,,,,,,, the system may disclose your health info. in response to a Court or administrative order.

In reviewing the complaint the Court must accept all well factual allegations as true, *Ashcroft v Iqbal*, 556 U.S. 662, 678-79 (2009). But it does not have to accept as true [t]hreadbare recitals of the elements of the cause of action, which are essentially just legal conclusions. *Atl Corp. v Trombly* 550 U.S. 544 570 (2007) where the claims are factually plausible if the plaintiff pleads enough factual detail to allow the Court to draw inference that the defendant's are liable for the alleged misconduct.

The plaintiff asks this Court to review the claims being asserted under rule 8.

The basis of the claims herein are that Defendant Lise Wilson divulged medical information about the petitioner to ADA ADRIAN Murphy without authorization.

Adrian Murphy in turn used that information to try and get NYCHA to put the petitioner on the streets which Lise Wilson and other medical providers/MD's "piggy backed" on and at the present are trying to exile the petitioner from the hospital in violation of *Younger v Harris* 401 U.S. 37 (1971); where this is clear cut harassment where the harassment has become injurious to the plaintiffs health, see also *Gibson v Berryhill*, 411, U.S. 564, 573-74 (1973) citing *Younger v Harris* supra, Adrian Murphy and the defendant Lise Wilson has acted in bad faith resulting in the deliberate and indifferent treatment of a patient that has a "very serious" medical history that has culminated to this point. Several doctors, MD's and the social worker Lise Wilson were issuing communicating with the Court on reasons the petitioner, the Judge, and anyone who needed to be in the know as to why the

petitioner could not make it to Court. Several letters have been written to the Court explaining why the doctors do not want the petitioner traveling.

The petitioner wants this case over as soon as possible. The Court's do not seem to understand that and over doctors objections, is "hell bent" on trying to override those orders, to force the petitioner up there to Westchester County to a "rigged trial" over doctors orders, everytime the doctors give an order on the health of the petitioner to remain immobile, Justice Warhit Harasses the petitioner with threat's of prison, warrants for her arrest etc. So, under the circumstances, the petitioner asks this Court to enjoin both actions so that this Court can see the harassment perpetuated by the Westchester County District Attorney's office and the Court.

The petitioner is being accused of avoiding coming to Court and that is not the case, the petitioner has attempted to go up there based on the doctor's orders based on threats from the doctors orders and collapsed and had to be taken to Westchester County's emergency room (via Ambulance), it was the doctors that diagnosed the petitioner's condition and the hospital was waiting til the petitioner was healthy enough to travel until The defendant Lise Wilson spoke to the DA and "Provided " the DA with information on the petitioner's medical condition which she is not authorized to do, any person with a small modicum of knowledge would ask; "what is Lise Wilson doing talking to ADA Murphy Period,much more about the petitioner's medical condition.

Neither the ADA nor Lise Wilson should have been discussing the petitioner's medical situation, the question this Court must ascertain is: who called who and why? it is clear that this is where this started and should have never taken place to begin with.

Lise Wilson is under contract not to discuss any patients medical history with anyone, in fact, NYC health and hospitals corporation d/b/a/ NYC (health + hospitals also referred to as the system) "is required UNDER FEDERAL LAW) specifically the health insurance portability and accountability act of (1996) HIPPA "to maintain privacy" of your protected health information per, NYC Health and Hospitals Notice of Privacy Practices introduction manual includes providing you with notice of its legal duties, also, you may be afforded additional protections and rights under (FEDERAL L AND OR STATE LAW) that are not described in this manual.

Younger v Harris supra, states that the United States Supreme Court held that a Federal Court may not enjoin a pending State-Court criminal proceeding in the absence of special circumstances suggesting bad faith, harassment, or irreparable injury that is both serious and immediate, See Gibson v Berryhill supra, in any event, the petitioner has demonstrated to this Court both bad faith, harassment by the District Attorney and the hierarchy of Harlem Hospital Medical Center, and if at all possible, the petitioner asks this Court to issue "a reparative injunction and stay" her pending State Court proceeding because

of the exigent circumstances of harassment, bad faith, and the additional aggravating factors that the stress level has caused the petitioner's health to go into decline based on the threats issued by Justice Barry E. Warhit, the defendant's has tried to make the petitioner out to be the bad person in this pandemonium but on one of the petitioner's recent visits to the hospital the petitioner was so scared of what these defendant's were trying to do to her that she was covering herself in any way she could, she did not know what to do so she started tape recording the defendant's conversations and what came out on this recording would hold the NYC health and Hospitals manual and protocols in pure contempt, the defendant's know I caught them "conspiring" against ^{See} M^E and to make matters worse, when they were caught, they said "we were not discussing you" and when they knew they were being taped, the treatment stopped because they are hell bent on finding out "what little indiscretions I caught", In any event I will provide that tape to this Court as evidence of their little coupe they are trying to pull and this is why Younger v Harris must be applied in the case at bar, the petitioner prays that the following injunctive relief be granted as well as Monetary relief granted;

AS FOR THE FIRST CAUSE OF ACTION AGAINST Lise wilson:
THE PETITIONER ASKS FOR THE AMOUNT OF (\$2.8,000,000 (\$2.8

million in damages for the Slander and lies along with the disclosure of of her personal medical information to Adrian Murphy whom is not in any way an employee of NYC health + and hospitals, she also calls for the "firing" of Lise Wilson so that this does not happen to anyone else.

AS FOR THE SECOND CAUSE OF ACTION

Against Christopher PENA and RONALD COBBS; the petitioner, asks this for the amount of \$275.000 in their role being complicit in the conspiracy to report false incidents, slander, and deliberate indifference to try and have the petitioner "ousted from the hospital's patient roster where she is scheduled for several surgeries that are life threatening so that they do not have to treat her, the defendant's CHRISTOPHER PENA and RONALD COBBS being aware of the seriousness of the petitioner's medical history and the injuries at present puts the petitioner's life in limb, even a cursory reading of petitioner's file would indicate to any person with a small amount of medical knowledge knows that to try and "oust" the petitioner" from Harlem hospital at this time deliberately could endanger her life with the amount of internal injuries and external injuries to the point that she could die and this Court should take judicial notice that some of the more serious injuries come from a compound of stress du to threat's from Westchester County's Barry E. Warhit that cannot be sued or disciplined for his actions that may have resulted in a pulmonary blood clot in which the petitioner responded to the threats of harassment by the Court that "if she is not in Court by a certain date, "Disregarding" the note sent by NP (BURRELL), the petitioner risked her life out of fear and went up to Westchester and collapsed and had to be taken to the emergency room.

So, for COBBS AND PENA, the petitioner asks for the amount of \$275.000 each.

AS FOR THE THIRD CAUSE OF ACTION

NYC HEALTH and HOSPITALS, CEO MITCHELL H. KATZ being responsible for his employees conduct is libel and the petitioner is asking for the amount of, \$11,000,000 (Million) dollars for the injuries due to the lack of care due to LISE WILSON'S conduct which has caused her health to decline because of its employees actions.

CONCLUSION.

w h e r e f o r e, the petitioner prays that this Court grants the relief requested herein, and for other and further relief as this Court may deem just and proper.

Sonja Griffin-Robinson
P.O. Box 928
N.Y. N.Y. 10029

USMP3
SDNY

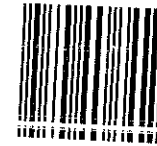
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Attn: Honorable Colleen McMahon (Chief Judge)
United State Southern District Court
500 Pearl St. Pro-Se Intake Clerk Rm #122
New York, N.Y. 10007

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